

# Exhibit F

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HORACE CLAIBORNE, SONJIA MONIQUE  
BOWLIN, TYSHAWN WALKER, WILLIE  
SEALS, FREDERICK EPPICH, JEROME  
SCHOOLFIELD, KRISTINA TRAVIS,  
JEREMY WINKELS, ARTHUR FOSTER III,  
ERNESTO DIAZ, GERALD GENSOLI, and  
THOMAS DEPPIESSE,

Plaintiffs,

v.

FEDEX GROUND PACKAGE SYSTEM,  
INC.,

Defendant.

No. 2:18-cv-01698-RJC

JURY DEMANDED

**PLAINTIFF JEROME SCHOOLFIELD'S SUPPLEMENTAL RESPONSES TO  
DEFENDANT FEDEX GROUND'S FIRST SET OF INTERROGATORIES**

Plaintiff Jerome Schoolfield hereby supplements his responses to the interrogatories propounded by Defendant FedEx Ground Package System, Inc. ("FedEx"). Plaintiff reserves his right and will meet his obligation to further supplement his responses if and when necessary.

**GENERAL OBJECTIONS**

Plaintiff's responses to these interrogatories are subject to the General Objections set forth below. These objections are incorporated into the response to each and every interrogatory and are set forth in this manner to avoid duplication and restatement. For the purpose of clarity, the responses to certain Interrogatories may refer specifically to one or more General Objections. The failure to incorporate specifically a General Objection into a response, however, is not a waiver of the General Objection.

1. Plaintiff objects to each interrogatory to the extent that it seeks information subject to a privilege, including without limitation the attorney-client privilege.

**INTERROGATORY NO. 12:**

Identify and describe the method, manner, and medium through which any Service Provider provided you copies of or access to any payroll, hours, benefits, or other compensation-related documents or information, including without limitation identification of any online systems, applications, direct deposit to your bank, or other methods of access previously used or currently available to you to access such information.

**OBJECTION AND RESPONSE TO INTERROGATORY NO. 12:** Plaintiff objects to this interrogatory on the grounds that it is vague and ambiguous, overly broad, and unduly burdensome. Subject to and without waiving this objection, Plaintiff states that he is currently paid by Truck Dynasty via direct deposit, and that he receives his paystubs via email from Truck Dynasty's payroll department. At Frontline Delivery Services, Plaintiff used an app called Gusto to access his paystubs. Plaintiff further states that in the past he has been paid online via Quickbooks.

**INTERROGATORY NO. 13:**

Identify and describe the method, manner, and medium through which your Service Provider employers had you keep track of your time worked and how you submitted that time to your Service Providers, including without limitation identification of any phone, iPad or other applications, hard-copy time cards, photos of time records taken with your phone, etc.

**OBJECTION AND RESPONSE TO INTERROGATORY NO. 13:** Plaintiff objects to this interrogatory on the grounds that it is vague and ambiguous. Subject to and without waiving this objection, Plaintiff states that at Truck Dynasty, he is required to track his hours by logging in and out each day to a system called Homebase. Plaintiff was not required to track his hours at

AS TO ALL ANSWERS,

The foregoing answers are true and accurate to the best of my knowledge. Signed under the pains and penalties of perjury this 19th day of August, 2024.

*Jerome Anthony Schoolfield*

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Jerome Schoolfield

AS TO ALL OBJECTIONS,

Dated: August 19, 2024

Respectfully submitted,

HORACE CLAIBORNE, SONJIA MONIQUE  
BOWLIN, TYSHAWN WALKER, WILLIE  
SEALS, FREDERICK EPPICH, JEROME  
SCHOOLFIELD, KRISTINA TRAVIS, JEREMY  
WINKELS, ARTHUR FOSTER III, ERNESTO  
DIAZ, GERALD GENSOLI, and THOMAS  
DEPPIESSE

By their attorneys,

/s/ Shannon Liss-Riordan  
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